

# EXHIBIT A

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

WALTER EDWARD LEMM, JR., Individually  
and on Behalf of All Others Similarly Situated,

Plaintiff,

v.

NEW YORK COMMUNITY BANCORP, INC.,  
THOMAS R. CANGEMI and JOHN J. PINTO,

Defendants.

Case No. 1:24-cv-00903-NRM-JRC

DALE MISKEY, Individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

NEW YORK COMMUNITY BANCORP, INC.,  
THOMAS ROBERT CANGEMI and JOHN J.  
PINTO,

Defendants.

Case No. 1:24-cv-01118-NRM-JRC

**DECLARATION OF JASON STUBBS  
PRINCIPAL AND OWNER OF MOVANT SAND HOLLOW MANAGEMENT LLC IN  
REPLY TO THE OPPOSITION FILED BY BOSTON RETIREMENT SYSTEM**

I, Jason Stubbs, as principal and owner on behalf of Sand Hollow Management, LLC (“Movant” or “Sand Hollow”), pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I respectfully submit this Declaration in Reply to the filing made by movant Boston Retirement System (“BRS”) in opposition (“BRS Opposition” or “BRS Opp.”) (ECF No. 32) to my company’s, Sand Hollow’s, motion to be appointed Lead Plaintiff and the appointment of my counsel Faruqi & Faruqi LLP as Lead Counsel in the instant class action on behalf of investors in New York Community Bancorp, Inc. (“NYCB” or the “Company”).

2. I have read BRS’s Opposition in which it submitted purported “evidence of his criminal history”, referring to me. BRS was also referring to me when it stated that “Mr. Stubbs was placed on felony probation for child abuse in 2005.” In support, BRS submitted “results from a search of Mr. Stubbs’ criminal history indicating a felony probation sentence in Utah state court for child abuse.” BRS Opp. at 12.

3. That accusation is totally and completely false and slanderous.

4. I have reviewed the results referenced above, which is attached as an exhibit to an affidavit from a BRS attorney. This research document is a report generated by a private company Thomson Reuters. It is my understanding that reports such as the one cited generally include express disclaimers that the information contained therein may not be accurate. I believe it was irresponsible for BRS to publish this report and claim that it is referring to me without including in the same statement the fact that BRS did not independently verify the truth of the matters asserted and without including the disclaimers published by Thomas Reuters as to the lack of reliability of the information contained therein with the same prominence as the false allegations against me were published.. Exh. B ECF No. 32-3.

5. I have never been arrested for or otherwise charged with the crime identified in this research document, i.e., third degree felony child abuse. I have never been charged or convicted of a felony.

6. While the document that BRS obtained appears to have my name in it, this information regarding an arrest and probation did not happen to me.

7. I, Jason Stubbs, declare under penalty of perjury that the foregoing is true and correct.

Dated: April 29, 2024

DocuSigned by:  
*Jason Stubbs*  
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Jason Stubbs